

1 **DANA SNIEGOCKI, ESQ.**  
Nevada Bar No. 11715  
2 E-mail: dsniegocki@hkm.com  
3 **HKM EMPLOYMENT ATTORNEYS LLP**  
101 Convention Center Dr., Suite 600  
4 Las Vegas, Nevada 89109  
Tel: (702) 805-8340  
5 Fax: (702) 805-8340  
6 *Attorney for Plaintiff/Counter-Defendant*

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 ASHLEY DRISCOLL, an individual,

10 Plaintiff,

11 vs.

12 LIVBAY LASH, a domestic corporation;  
13 SHAUNA GARDNER JONES, an  
14 Individual; and DOES 1-50, inclusive; and  
15 ROE CORPORATIONS 1-50, inclusive,

16 Defendants.

**CASE NO.: 2:23-cv-1630**

**STIPULATION AND ORDER TO**  
**EXTEND TIME FOR PLAINTIFF**  
**ASHLEY DRISCOLL TO FILE A**  
**RESPONSIVE PLEADING**  
**TO DEFENDANTS'**  
**COUNTERCLAIMS**

**(SECOND REQUEST)**

17 IT IS HEREBY STIPULATED by and between Plaintiff Ashley Driscoll ("Plaintiff"),  
18 through her counsel HKM Employment Attorneys LLP, and Defendants Livbay Lash and  
19 Shauna Gardner Jones (collectively, "Defendants"), through its counsel Littler Mendelson, P.C.  
20 that Plaintiff shall have a 14-day extension up to and including Friday, January 26, 2024, in  
21 which to file a responsive pleading to Defendants' Answer and Counterclaims (ECF No. 6).  
22 This Stipulation is submitted and based upon the following:

23 1. The parties previously stipulated to extend the time for Plaintiff to file a  
24 responsive pleading to Defendants' Counterclaims which was granted by the Court on  
25 December 22, 2023 (ECF No. 9).

26 2. Plaintiff's response to Defendants' Counterclaims is currently due Friday  
27 January 12, 2024.

28 3. Since entry of the Court's Order, the parties have engaged in informal settlement

1 discussions and have discussed the possibility of scheduling a settlement conference with the  
2 Court. The parties anticipate they will submit a stipulation requesting that a settlement  
3 conference with the Court be scheduled.

4 4. Accordingly, the parties believe an additional extension for Plaintiff to respond  
5 to the Counterclaims would permit the parties to direct their efforts towards resolution.

6 5. This is the second request for an extension of time for Plaintiff to file a  
7 responsive pleading to Defendants' Counterclaims.

8 6. This request is made in good faith and not for the purpose of delay.

9 7. Nothing in this Stipulation, nor the fact of entering to the same, shall have the  
10 effect of or be construed as waiving any claim or defense held by any party hereto.

11 Dated this 9th day of January 2024.

12 **HKM EMPLOYMENT ATTORNEYS LLP**

**LITTLER MENDELSON, P.C.**

13  
14 By: /s/ Dana Sniegocki

DANA SNIEGOCKI, ESQ.

15 Nevada Bar No. 11715

E-mail: [dsniegocki@hkm.com](mailto:dsniegocki@hkm.com)

16 HKM EMPLOYMENT ATTORNEYS LLP

101 Convention Center Dr., Suite 600

17 Las Vegas, Nevada 89109

18 Tel: (702) 805-8340

Fax: (702) 805-8340

19 *Attorney for Plaintiff/Counter-Defendant*

By: /s/ Michael D. Dissinger

PATRICK H. HICKS, ESQ.

Nevada Bar No. 4632

[phicks@littler.com](mailto:phicks@littler.com)

MICHAEL D. DISSINGER, ESQ.

Nevada Bar No. 15208

[mdissinger@littler.com](mailto:mdissinger@littler.com)

3960 Howard Hughes Parkway, Suite 300

Las Vegas, Nevada 89169.5937

Telephone: 702.862.8800

Fax No.: 702.862.8811

*Attorney for Defendants/Counterclaimants*

22 **ORDER**

23  
24 **NO FURTHER EXTENSIONS  
WILL BE GRANTED.**

IT IS SO ORDERED:

25  
26   
United States Magistrate Judge

27 Dated: January 10, 2024